

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

NOV 18 2015

IN THE MATTER OF:

Archer Daniels Midland Company
3883 Faries Parkway
Decatur, Illinois 62526

ATTENTION:

Peter Brinkoetter, ADM West Environmental Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring the Archer Daniels Midland Company (ADM) to submit certain information about its Decatur, Illinois Facility located at 4666 Faries Parkway (the Facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that ADM must submit. ADM must send this information to EPA within forty-five (45) calendar days after receipt of this request, unless otherwise specified.

EPA is issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

ADM owns and operates a major emissions source (as defined by the CAA) at its Decatur, Illinois Facility. EPA is requesting this information to determine whether this emissions source is complying with the CAA.

ADM must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

ADM must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

EPA may use any information submitted in response to this request in an administrative, civil or criminal action. Failure to comply fully with this information request may subject ADM to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any technical questions about this information request to Ethan Chatfield at (312) 886-5112 and any legal questions about this information request to Leslie A. Kirby-Miles at (312)353-9443.

Date

11/18/15

George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The term "funding request" shall mean capital appropriation request, capital expenditure request, and/or any request for a monetary expenditure on depreciable equipment, including any costs to design, engineer, transport, and install said equipment.
2. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
3. The term "related to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

4. The term "ADM" shall mean Archer Daniels Midland Company and all subsidiaries and related entities.
5. The term "West Soybean Plant Expansion" shall mean the ADM Decatur West Soybean Processing Plant Capacity Expansion Project as applied for by ADM to Illinois Environmental Protection Agency or IEPA (Application No. 15070024) in or around July 2015 with the final Construction Permit issued September 22, 2015.

Appendix B

Information You Are Required to Submit to EPA

ADM shall provide the information below for its Decatur, Illinois Facility in complete and unredacted format using the instructions and definitions provided in Appendix A. If possible, EPA requests that all information be provided in electronic (.pdf or .xls) format.

1. Provide copies of all emissions calculations (in original, Excel compatible format and including any linked or associated spreadsheets) for the West Soybean Plant Expansion. Include with the calculations a source for each emission factor utilized.
2. Provide an explanation of and all supporting documents, reports, and other data relied upon to derive the "Project Steam Increase" of 138,043 Mlb/yr resulting from the West Soybean Plant Expansion. Also, include in this explanation how the "West Bean Plant Steam Use Factor" on page C-24 of the Construction Permit Application for the West Soybean Plant Expansion submitted to IEPA in July 2015 (Permit Application) was derived.
3. Provide all studies, evaluations, assessments and/or reports pertaining to the expected/projected usage of steam due to the West Soybean Processing Plant Expansion Project.
4. Explain how ADM calculated/derived the "Beans Crushed" – "Projected without Project" throughput of 2,190,000 tons per year. See Permit Application at page C-30. If this level of production was intended to be a production rate that the West Soybean Processing Plant "could have accommodated" (as that phrase is used in 40 C.F.R. §52.21(b)(41)(ii)(c)), provide any and all supporting documentation that ADM relied upon to demonstrate that this throughput has been achieved or could have been achieved at the plant during the baseline period. Also, provide any and all permits that support ADM's "Current Crush Limit" of 2,190,000 tons per year as cited in the Permit Application at page C-24.
5. Explain, if possible, the apparent inconsistency within the Permit Application where ADM states that the "Baseline Solvent Loss" rate of 289,903 gallons per year was calculated using the "annual average rate in 24 consecutive month period ending *August 31, 2008*" (Permit Application at page C-22, *emphasis added*), but also states that baseline period ends July 2008. Permit Application at page C-24.
6. Provide all calculations and associated documents supporting ADM's calculated 47.2 tons per year of "excludable VOC" emissions. See Permit Application at page C-22.
7. Provide any and all outage/derate logs for the West Soybean Processing Plant from January 1, 2005 to the date of this request. Logs should include the date, time, and length of any outage/derate, the specific reason for the outage/derates, and any work completed during the outage/derate.

8. For each project in the table entitled "Project List" below provide:

- a. all associated final funding requests, including any supporting documentation and attachments;
- b. the date that construction commenced and was completed (or is projected to commence and be completed);
- c. a copy of the final (or proposed if not yet final) construction permit;
- d. a complete copy of any associated air permit application(s); and
- e. a copy of all emission calculations completed for the project, including, but not limited to any estimated increases in steam demand associated with the project.

| Project List ¹ |
|---------------------------------|
| West Soybean Plant Expansion |
| Glycol Plant |
| SPC Plant Expansion |
| West Germ Plant Expansion |
| Lysine Plant Expansion |
| Cell Mass Pilot Project |
| Threonine Expansion |
| Lysine Plant Expansion (future) |
| Clarisoy |
| Threonine Cell Mass |

9. Provide copies of any studies, evaluations, assessments and/or reports completed since January 1, 2005, related to changes in the capacity of any part of the Facility.
10. Provide any and all correspondence and/or documents (and associated attachments) that discusses how the work associated with the expansions identified in the table above is or may be technically or economically related or linked to other work associated with any portion of the expansions identified in the same table.
11. Provide the dates of installation and the original, current, and projected design maximum steam demand capacity (lbs/hr) for each process unit at the Facility that utilizes steam from the ADM Cogeneration plant. Also, provide the actual, annual steam usage for calendar years 2013 and 2014 for each process unit that utilizes steam and its location in the Facility.
12. Provide the complete manufacturer and design specifications for each of the proposed and existing soybean flaking units.
13. Provide all funding request(s) and/or any work order(s) associated with the installation of the new soybean flaking units identified in the Permit Application.

¹ As cited in ADM's September 10, 2015, "Decatur West Soybean Processing Plant Expansion Project: Revised Tables and Additional Data" in chart titled "Decatur-Cogeneration Plant Projected Production Rates."

14. Provide the actual maximum monthly horsepower achieved by each existing flaking unit that is being replaced from January 1, 2013 to the date of this request.
15. Provide a copy of the Annual Emissions Report submitted to IEPA for calendar years 2005 through 2014 that details any and all emissions units, emission factors, equations, and emissions from the Facility.
16. Provide a list of all capital projects of an amount greater than \$100,000 approved or completed between January 1, 2005 and the date of this request for the Facility. For each such capital project identify: (1) the work performed, (2) the date completed or projected to be completed, (3) the project work order number and (4) the dollar amount approved and/or expended.
17. Provide the following data on a monthly basis from January 1, 2000 to the date of this request for the West Soybean Processing plant:
 - a. total beans received (tons/month);
 - b. total hull pellets produced (tons/month);
 - c. total beans crushed (tons/month);
 - d. total soymeal produced (tons/month);
 - e. total solvent loss (gallons/month);
 - f. estimated VOC emissions (tons/month) with supporting calculations;
 - g. estimated PM emissions (tons/month) with supporting calculations; and
 - h. hours of operation.
18. Provide the following data for each coal-fired boiler at the ADM Decatur Cogeneration plant:
 - a. the emission unit identification number;
 - b. the date construction of the unit commenced;
 - c. the date commercial operation began;
 - d. the retirement date or projected retirement date (if applicable);
 - e. the current gross and net steam generating capacity;
 - f. the current maximum heat input capacity (mmBtu/hr);
 - g. current fuel type(s) and percentages of each fuel being fired;
 - h. a diagram of the control system for each boiler, denoting all boilers, bypasses, emission controls, air heaters, turbines and boiler stacks/flues (denoting north direction);
 - i. the type of particulate emissions control (manufacturer and design), date commenced operation (or projected to commence operation), and design outlet emissions rate and removal efficiency specification and guarantees;
 - j. the type of sulfur dioxide emissions controls (manufacturer and design), date commenced operation (or projected to commence operation), and the design outlet emissions rate and removal efficiency specification and guarantees;

- k. the type of nitrogen oxides emissions controls (manufacturer and design), date commenced operation (or projected to commence operation), and the design outlet emissions rate and removal efficiency specification and guarantees;
 - l. the type of mercury emissions controls (manufacturer and design), date commenced operation (or projected to commence operation), and the design outlet emissions rate and removal efficiency specification and guarantees; and
 - m. any other emissions controls (or upgrades) not listed above (or emissions controls planned for installation in the next two years), the date such controls commenced operation (or are projected to commence operation), and the design outlet emissions rate and removal efficiency specifications and guarantees.
19. For each coal-fired unit at the Cogeneration plant, provide the following data on a monthly basis from January 1, 2000 to the date of this request:
- a. steam output (lbs steam);
 - b. fuel type(s) and quantities for each type (tons or gallons);
 - c. average heat content (Btu/lb) for each fuel burned;
 - d. fuel quality (% sulfur);
 - e. total hours under load;
 - f. NO_x emissions (tons);
 - g. SO₂ emissions (tons); and
 - h. capacity factor (%).
20. Provide a list (in electronic Microsoft Excel compatible format, if available) of all boiler/turbine outages or derates at each coal boiler at the Cogeneration plant that includes the unit, date, time, and length of the outage/derate, the specific reason for the outage/derate, and any work completed during the outage/derate from January 1, 2000 to the date of this request.
21. Provide copies of all load capacity test data/test reports for each coal-fired boiler at the Cogeneration plant from January 1, 2000 to the date of this request.
22. Provide copies of any studies, evaluations, assessments and reports since January 1, 2000, related to extending the life, increasing steam availability, or improving the reliability of any coal-fired boiler at the Cogeneration plant.
23. For each coal-fired boiler at the Cogeneration plant, provide the following information, from January 1, 2011 to the date of this request (to the extent available, please provide in electronic format, such as a Microsoft Excel compatible spreadsheet):
- a. all continuous opacity monitor system (COMS) data showing exceedances of the applicable opacity limits denoting any periods of claimed exceptions or exemptions (but prior to the removal of any claimed exceptions or exemptions);
 - b. all NO_x CEMS emissions data showing exceedances of any applicable limits, denoting any periods of claimed malfunction, startup, and shutdown; and

- c. all SO₂ CEMS emissions data showing exceedances of any applicable limits and/or denoting any periods of claimed malfunction, startup, and/or shutdown.
- 24. Provide a copy of all test reports for any stack test completed at the West Soybean Processing plant and Cogeneration plant from January 1, 2000 to the date of this request for the following pollutants: particulate matter (including PM, PM₁₀ and PM_{2.5}), sulfur dioxide (SO₂), sulfuric acid mist (H₂SO₄ or SO₃), mercury, and hydrogen chloride (HCl). Exclude all CEMS Relative Accuracy Test Audit (RATA) data.
- 25. Provide a copy of all Title V deviation reports submitted to IEPA since January 1, 2012.
- 26. Provide a copy of all IEPA Violation Notices since January 1, 2005 for the Facility.
- 27. Provide a copy of any and all strategic plan(s) for the Facility that discusses long term expansions plans at the Facility from 2005 to the date of this request.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

- Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

- Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

- A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, C. Hampton, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Peter Brinkoetter, Environmental Manager
Archer Daniels Midland Company
3883 Faries Parkway
Decatur, Illinois 62526

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Eric Jones, Manager
Compliance and Enforcement Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62702

On the 18 day of November 2015.



Loretta Shaffer
Program Technician
Planning and Administration Section

CERTIFIED MAIL RECEIPT #:

7014 2870 0001 9581 3642